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Attorneys for Defendants World  
Wrestling Entertainment, LLC, and  
Fanatics LLC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

WESLEY EISOLD, an individual,  
Plaintiff,

vs.

CODY GARRETT RUNNELS, an  
individual, WORLD WRESTLING  
ENTERTAINMENT, LLC, a limited  
liability company; and FANATICS,  
LLC, a limited liability company,

Defendant.

Case No.: 2:24-CV-07516-AB(MARx)  
[Hon. André Birotte Jr.]

**DECLARATION OF STACEY H.  
WANG IN SUPPORT OF  
DEFENDANTS' REQUEST FOR  
JUDICIAL NOTICE**

**FILED CONCURRENTLY WITH  
DEFENDANTS' MOTION TO  
DISMISS PLAINTIFFS' FIRST  
AMENDED COMPLAINT**

HEARING

DATE: JAN. 24, 2025  
TIME: 10:00 A.M.  
CTRM: 7B

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**DECLARATION OF STACEY H. WANG**

I, Stacey H. Wang, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated herein. I could truthfully testify thereto if called upon as a witness.

2. I am a partner at the law firm of Holland & Knight LLP and am counsel for Defendants World Wrestling Entertainment, LLC and Fanatics, LLC.

3. On November 21, 2024, I accessed the United States Patent and Trademark Office's ("USPTO") Trademark Status and Document Retrieval ("TSDR") tool and downloaded the prosecution histories for, and current statuses of, U.S. Trademark Registration Nos. 3538710, 4625255, 3412176, 4689835, 2772683, 4538210, and 4689839. True and correct copies of the TSDR records for U.S. Trademark Registration Nos. 3538710, 4625255, 3412176, 4689835, 2772683, 4538210, and 4689839 are attached to Defendants' Request for Judicial Notice as Exhibit A.

4. On November 21, 2024, I accessed the USPTO's TSDR tool and downloaded the prosecution history for, and current status of, U.S. Trademark Registration No. 6256132. A true and correct copy of the TSDR records for U.S. Trademark Registration No. 6256132 is attached to Defendants' Request for Judicial Notice as Exhibit B.

5. On November 21, 2024, I accessed the USPTO's TSDR tool and downloaded the prosecution history for, and current status of, U.S. Trademark Registration No. 6397093. A true and correct copy of the TSDR records for U.S. Trademark Registration No. 6397093 is attached to Defendants' Request for Judicial Notice as Exhibit C.

6. On November 21, 2024, I accessed an Encyclopedia Britannica publication online which is related to Cody Runnels. The publication is available online at <https://www.britannica.com/biography/Cody-Rhodes>. A true and correct copy of the publication is attached to Defendants' Request for Judicial Notice as Exhibit D-1.

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1           7. On November 21, 2024, I accessed a New York Times article online which  
2 is related to Cody Runnels. The article is available online at the following link:  
3 <https://www.nytimes.com/athletic/5398800/2024/04/08/cody-rhodes-wrestlemania->  
4 [wwe-dusty-rhodes/](https://www.nytimes.com/athletic/5398800/2024/04/08/cody-rhodes-wrestlemania-). A true and correct copy of the article is attached to Defendants'  
5 Request for Judicial Notice as Exhibit D-2.

6           8. On November 21, 2024, I accessed an entertainment publication related to  
7 Cody Runnels which was posted on The Sportster's online website. The publication is  
8 available online at the following link: [https://www.thesportster.com/wwe-story-behind-](https://www.thesportster.com/wwe-story-behind-cody-rhodes-infamous-neck-tattoo-explained/)  
9 [cody-rhodes-infamous-neck-tattoo-explained/](https://www.thesportster.com/wwe-story-behind-cody-rhodes-infamous-neck-tattoo-explained/). A true and correct copy of the  
10 publication is attached to Defendants' Request for Judicial Notice as Exhibit D-3.

11           9. On November 21, 2024, I accessed a video posted on YouTube which is  
12 related to Cody Runnels and his dog, Pharaoh. At the time of this declaration, the video  
13 is available online at <https://www.youtube.com/watch?v=3lvp76knUto>. The video is  
14 referenced in Defendants' Request for Judicial Notice as Exhibit E-1. The video is  
15 available to be lodged with the Court in the Court's preferred format upon request.

16           10. On November 21, 2024, I accessed a video posted on YouTube which is  
17 related to Cody Runnels and his dog, Pharaoh. At the time of this declaration, the video  
18 is available online at [https://www.youtube.com/watch?v=I\\_jvVXxOfSM](https://www.youtube.com/watch?v=I_jvVXxOfSM). The video is  
19 referenced in Defendants' Request for Judicial Notice as Exhibit E-2. The video is  
20 available to be lodged with the Court in the Court's preferred format upon request.

21           11. On November 21, 2024, I accessed a video posted on YouTube which is  
22 related to Cody Runnels. At the time of this declaration, the video is available online at  
23 [https://www.youtube.com/watch?v=S5O4E\\_B5cNQ](https://www.youtube.com/watch?v=S5O4E_B5cNQ). The video is referenced in  
24 Defendants' Request for Judicial Notice as Exhibit E-3. The video is available to be  
25 lodged with the Court in the Court's preferred format upon request.

26           12. On November 21, 2024, I accessed a video posted on YouTube which is  
27 includes video clips from the WWE 2K24 video game. At the time of this declaration,  
28 the video is available online at <https://www.youtube.com/shorts/agtMnYdsg6Y>. The

1 video is referenced in Defendants' Request for Judicial Notice as Exhibit E-4. The video  
2 is available to be lodged with the Court in the Court's preferred format upon request.

3  
4 I declare under penalty of perjury and under the laws of the United States that the  
5 foregoing is true and correct. Executed this 22nd day of November, 2022, at Los  
6 Angeles, California.

7  
8 /s/ Stacey H. Wang  
9 Stacey H. Wang  
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